

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

Ru-El Sailor,

Plaintiff,

vs.

City of Cleveland, *et al.*,

Defendants.

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Case No. 1:20-CV-00660

Judge David A. Ruiz

**DEFENDANT CITY OF CLEVELAND'S
MOTION FOR A PROTECTIVE ORDER**

Defendant City of Cleveland, by and through counsel, hereby moves this Court for a protective order to prevent the Rule 30(b)(6) deposition noticed by Plaintiff Ru-El Sailor. (*See* Exhibit A, Notice). Because this Court has already stayed discovery, it should grant Cleveland a protective order. Alternatively, Sailor's noticed deposition is duplicative and overly burdensome, so this Court stay discovery for this reason too. A memorandum in support is attached.

Respectfully submitted,

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Law Director

s/ Matthew R. Aumann

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties through the Court's electronic filing system. Parties may access this filing through the Court's system.

s/ Matthew R. Aumann
Matthew R. Aumann (0093612)